

EXHIBIT A-1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN THE MATTER OF:

DILIP JANA
Plaintiff,

v.

WALMART, INC.,
Defendant.

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Civil Action No. 4:24-cv-00698-SDJ-BD

Affidavit of Dr. Dilip Jana in Support of Plaintiff's Emergency Motion to Place Walmart's July 18, 2025 Production in the Public Domain

Pursuant to 28 U.S.C. § 1746, I, Dr. Dilip Jana, declare under penalty of perjury that the following is true and correct:

1. **Identity.** I am the Plaintiff in the above-captioned matter. I am over the age of 18, of sound mind, and competent to testify to the matters stated herein.
2. I hold a Ph.D. in Nuclear and Particle Physics and was one of the contributing authors for the experimental discovery of the Higgs boson in 2012, work that led to the 2013 Nobel Prize in Physics awarded to the theoreticians who predicted the Higgs boson in 1964-1970.
3. I have extensive professional experience in data science, Physics, Applied statistics, and analytics. I served as Director of Data Science at Walmart, Inc., where I led enterprise-scale

initiatives in anomaly detection, threat detection, predictive modeling and many other projects.

4. In **February 2023**, Walmart itself formally recognized my contributions in its Annual Review, stating: *"the work that you steered for Walmart forensics team... also known as the anomaly detection work, which in FY23 delivered finance-verified **more than \$250 million in GMV**... the end of January."*; the anomaly detection system is now **patent pending** (*U.S. Patent Application Publication No. US20240346287A1*).
5. My professional background includes designing and validating high-stakes analytic systems, ensuring reproducibility of results, and performing forensic analysis of digital records. I am therefore well-qualified to identify tampered, fabricated, or otherwise unreliable digital evidence.

II. Source of Evidence

7. In August 2025, I examined the production file **WM-JANA VOL003.zip**, produced by Defendant Walmart, Inc., and located on my system at:
C:\Users\aubre\Downloads\ForensicAnalysis\data\WM-JANA VOL003.zip.
8. I developed algorithms in memory-analysis without unpacking Original .zip file
9. Within the directory NATIVES/NATIVE001, I analyzed the file
WM-JANA_0000260.EML. I conducted forensic analysis using Python/Jupyter-based tools to extract SHA-256 file hashes, message header presence, MIME metadata, and embedded Office file properties.

III. Forensic Findings

Parent EML (WM-JANA_0000260.EML):

9. SHA-256: 14257f62960710d79f9b4405629a820e40536d92ae4c09262218879abacd4fb0.

10. Header Analysis (Ex. 1, Ex. 2, Ex. 3):

- **Received: headers: Absent**
- **X-Received: headers: Absent**
- **Authentication-Results: Absent**
- **DKIM-Signature: Absent**
- **ARC-*: Absent**

⚠ **Smoking Gun #1:** The top-level .eml has zero routing or authentication headers. A genuine Outlook/Exchange email must contain at least one Received header.


Attachments:

11. The parent .eml contains six attachments (five .eml files and one Word document). Forensic review revealed:

- **Part #1 – .eml (From: Dilip Jana, 04 Oct 2023 06:30)**
 - CD creation-date: 04 Oct 2023 23:06:59
 - CD modification-date: **20 Oct 2024 06:12:37** ⚠
 - Headers inside: at least one Received present.

- **Part #2 – .eml (From: Dilip Jana, 04 Oct 2023 05:01)**
 - CD creation-date: 04 Oct 2023 23:07:05
 - CD modification-date: **20 Oct 2024 06:12:37** 
- **Part #3 – .eml (From: Dilip Jana, 04 Oct 2023 04:37)**
 - CD creation-date: 04 Oct 2023 23:07:14
 - CD modification-date: **20 Oct 2024 06:12:37** 
- **Part #4 – .eml (From: Dilip Jana, 04 Oct 2023 03:05)**
 - CD creation-date: 04 Oct 2023 23:07:18
 - CD modification-date: **20 Oct 2024 06:12:39** 
- **Part #5 – .eml (From: Adrian Milbourne, 04 Oct 2023 02:53)**
 - CD creation-date: 04 Oct 2023 23:07:28
 - CD modification-date: **20 Oct 2024 06:12:39** 
- **Part #6 – Recommendation.docx**
 - Size: 1,258,177 bytes | SHA-256:

bfdb2db5e677420d76640aa059407aeb5fd785c570a42666d4f48bc083d18e9d
 - CD creation-date: 04 Oct 2023 23:00:20
 - CD modification-date: **20 Oct 2024 06:12:39** 
 - Internal OOXML metadata: Created 27 Sep 2023, Modified 29 Sep 2023.
 - Forensic analysis shows **106 prior revisions** and last modified by **Adrian Milbourne**.

 **Smoking Gun #2:** Every attachment — including five transmitted emails and the Word document — shows a **modification-date of 20 October 2024**, more than one year after the supposed October 2023 parent email date.

Additional Discrepancies:

12. **Size mismatch (Ex. 1):** MIME header size for Recommendation.docx = 1,266,258 bytes, but actual file = 1,258,177 bytes (difference: 8,081 bytes).

IV. Consolidated Summary

- 13. Total .eml analyzed: 1 (WM-JANA_0000260.EML).
- 14. Parent email: **no routing/authentication headers** — not a genuine sent email.
- 15. All six attachments: **Content-Disposition modification-date = 20 Oct 2024.**
- 16. Recommendation.docx: internal vs. external timestamps inconsistent, 106 revisions, last modified by Adrian Milbourne. No Track changes available.
- 17. These anomalies collectively prove the production was not a faithful native export but a **reconstructed wrapper with tampered attachments.**

V. Exhibits

- **Ex. 1** – header absence and size discrepancy
- **Ex. 2** – Screenshots of forensic part-by-part analysis (attachments mod-dated 20 Oct 2024).
- **Ex. 3** – Header Presence Summary (CSV: parent had Received=False; attachments Received=True).
- **Ex. 4** – Forensic metadata table for attachments.
- **Ex. 5** – DOCX analysis: 106 revisions, LastModifiedBy Adrian Milbourne.

VI. Conclusion

18. Based on my education, training, and forensic review, I conclude that

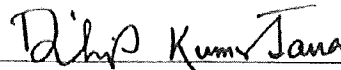
WM-JANA_0000260.EML is not an authentic native email, but instead a locally constructed container with attachments that were re-wrapped and last modified on 20 Oct 2024.

19. These findings establish **spoliation and fabrication** of material evidence.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of August, 2025, in Allen, Texas.

Respectfully Submitted,



DILIP JANA, Plaintiff

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